

Exhibit 63:

A.C. Deposition Transcript (redacted)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

JOHN DOES A, B, C, D, E, F, G,
H, MARY DOE and MARY ROE, on
behalf of themselves and all
others similarly situated,

Plaintiffs,

-vs-

GRETCHEN WHITMER, Governor of
the State of Michigan, and
COL. JOSEPH GASPER, Director
of the Michigan State Police,
in their official capacities,

Defendants.

of A.C., a witness called by Defendants,
taken before Melinda S. Nardone, Certified Shorthand
Reporter and Notary Public, via Zoom, on Tuesday, May
16, 2023, noticed for the hour of 9:00 a.m.

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1 APPEARANCES:

2 AMERICAN CIVIL LIBERTIES UNION FUND OF MICHIGAN
2966 Woodward Avenue
3 Detroit, Michigan 48201
4 By
DAYJA TILLMAN, J.D.

5 On behalf of Plaintiff.

6 MICHIGAN DEPARTMENT of ATTORNEY GENERAL
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Lansing, Michigan 48909
8 By
SCOTT DAMICH, J.D.

10 On behalf of Defendants.

12 EXAMINATION INDEX

13 ATTORNEY'S NAME	EXAMINATION	RE-EXAMINATION
14 BY MR. DAMICH:	4	54
15 BY MS. TILLMAN:	46	

17 * * *

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24
25

1 name out there in the public sphere.

2 THE WITNESS: Thank you.

3 MR. DAMICH: Will the court reporter please
4 confirm that she's read the protective order and signed
5 the acknowledgment?

6 COURT REPORTER: Yes, I have.

7 MR. DAMICH: Okay. And then will counsel
8 affirm that the person tendered is, in fact, declarant
9 AC?

10 MS. TILLMAN: Yes, this is AC.

11 EXAMINATION

12 BY MR. DAMICH:

13 Q. All right, sir, have you ever been deposed
14 before?

15 A. No.

16 Q. Okay. So the way I always like to explain a
17 deposition is basically, at least my goal of it all is
18 to have a conversation with you.

19 A. Okay.

20 Q. I like to treat it as conversational as possible.
21 I will be selfish about it, I'm the one that drives the
22 conversation, I ask the questions and then you answer
23 them. Now, part of the conversation too that's special
24 about this one is that we're being recorded and
25 everything that we're saying is being written down by

3

1 Tuesday, May 16, 2023

2 9:05 a.m.

3 R E C O R D

4 A.C.,

5 having been first duly sworn, testified as follows:

6 MR. DAMICH: Good morning, my name is Scott
7 Damich and I'm an assistant attorney general with the
8 State of Michigan, I represent Governor Whitmer and
9 Colonel Gasper. And I noticed your deposition in the
10 case of Does V Whitmer, Case Number 2:22-cv-10209, which
11 is pending in the Eastern District Court -- which is
12 pending in the district court in the Eastern District of
13 Michigan in front of the Honorable Judge Goldsmith.

14 So there's what's called a protective order
15 in place in this case and it's found at ECF number 88,
16 page ID 2389-2395. And the purpose of this protective
17 order is exactly what it sounds, it's to protect your
18 identity. As we'll go through here in a second I'm
19 going to ask you a series of questions and my goal today
20 is to ask questions today in a way that don't elicit
21 responses that will identify your personal information.

22 THE WITNESS: Okay.

23 MR. DAMICH: So if I mess up, we'll work on
24 it, me and counsel will work together to make sure that
25 that gets redacted. It's not my goal today to get your

5

1 Mindy and because of that Mindy won't be able to record
2 if I ask you a yes, no question, she won't be able to
3 record a yes or a no if you nod yes or no. You have to
4 say yes or no.

5 A. Verbalize it.

6 Q. Exactly. The other thing too is that cross talk
7 is going to be a problem for Mindy to record who said
8 what and it's also probably just going to annoy the heck
9 out of her so we're going to do our best to avoid cross
10 talking today. I know I will on my end, if I ask a
11 question I'll do my best to let you fully answer it, and
12 then if, in fact, if I'm asking you a question if you
13 let me do the same, let me get it all out and then you
14 can answer.

15 You're represented here today by counsel so
16 if I do ask a question you very well will hear an
17 objection. A lot of the objections you'll hear today
18 you'll still have to answer the question, the objections
19 will just be noted for the record. Let your counsel get
20 the objection out for the stated reasons then answer the
21 question.

22 Part of my conversation with you today, a
23 major point of what it's not meant to be is to confuse
24 you or to trick you or to get you to say something that
25 gets you like an, oh, I got you moment. That's not my

1 goal here today. So with that in mind, if you don't
 2 understand a question I'm asking you say it, Scott, I
 3 don't know what you're talking about, I don't know what
 4 you mean by this word, this phrase, let me know and I'll
 5 do my best to rephrase to get you at a better level of
 6 understanding of what I'm trying to get at. With that
 7 in mind, if you have answered my question, is it fair to
 8 assume -- is it fair going forward that you understood
 9 the question that I asked, is that a fair rule.

10 **A. That's a fair rule.**

11 **Q.** All right, good.

12 **A. I need to understand the question, that's**
 13 **important.**

14 **Q.** Right, it's such an elementary thing to say, it's
 15 even hard to get out, to verbalize it, but, yeah, I
 16 appreciate you agreeing to that.

17 **A. I understand.**

18 **Q.** Another thing -- I don't anticipate this
 19 deposition taking too long this morning, but if you need
 20 to take a break, you need to take a break for any
 21 reason, if it's just to get up and walk around, you have
 22 to go to the bathroom, whatever, you're hungry, that's
 23 fine too. The only caveat that I have is if I ask you a
 24 question that you answer the question before you leave.
 25 If you can't think of reasons why, you seem like a

1 trustworthy guy, I don't think you're going to go and
 2 try to, hey, what should I say to that, but just to get
 3 rid of any of that kind of suspect.

4 **A. Okay.**

5 **Q.** Are you taking any medication or any substances
 6 that affects your memory or ability to answer questions
 7 truthfully today?

8 **A. No.**

9 **Q.** Okay. Is there anything else that might
 10 interfere with your ability to answer questions
 11 truthfully today?

12 **A. No.**

13 **Q.** Where are you located today?

14 **A. I'm at home.**

15 **Q.** And is home, is it an apartment or is it a house
 16 that you own?

17 **A. It's a condo I bought last year.**

18 **Q.** And is it fair to say that your condo is located
 19 within the metro Detroit area; is that fair to say?

20 **A. I believe so, yes. Yes.**

21 **Q.** Is it the southeastern part of the state?

22 **A. Yes.**

23 **Q.** Okay. So we'll stick with that designation for
 24 now, southeast part of the state.

25 **A. Okay.**

1 **Q.** Throughout today's deposition I'm going to be
 2 asking you about certain felonies that you were
 3 convicted of back in 2005, the criminal sexual conduct
 4 incident. If I talk -- if I reference your CSC
 5 conviction or your prior conviction, just so we're on
 6 the same page, we're talking about the one you were
 7 convicted of on August 31st, 2005?

8 **A. Correct.**

9 **Q.** Understood?

10 **A. Yes, understood.**

11 **Q.** Good deal. And so you were convicted in 2005 did
 12 you spend time in -- were you incarcerated?

13 **A. Yes, sir.**

14 **Q.** Okay. And so you were incarcerated in 2005
 15 until?

16 **A. 2014.**

17 **Q.** Okay. Before you were incarcerated where did you
 18 live?

19 **A. I had a condo in Warren.**

20 **Q.** So you had a condo in the eastern part --
 21 southeastern part of the state?

22 **A. Yes.**

23 **Q.** Then what happened to your condo after you were
 24 incarcerated?

25 **A. It was sold before I was incarcerated.**

1 **Q.** Okay. And is that the reason you sold it?

2 **A. Yes.**

3 **Q.** And how long did you own that -- did you own the
 4 condo?

5 **A. Yes, sir.**

6 **Q.** Of course, you sold it. How long did you own it
 7 for?

8 **A. Seven years.**

9 **Q.** Seven?

10 **A. Seven years, yes.**

11 **Q.** Do you remember what you sold it for?

12 **A. I want to say ninety-seven five.**

13 **Q.** Then you spent time incarcerated until 2014,
 14 right?

15 **A. Yes.**

16 **Q.** And then upon release where did you go to live?

17 **A. Paroled to my father's house.**

18 **Q.** And at that time was your father living in the
 19 southeastern part of the state?

20 **A. Yes.**

21 **Q.** Did your father ask for rent from you at all?

22 **A. No.**

23 **Q.** And how long did you live at your father's house?

24 **A. One year.**

25 **Q.** And then where did you go from there?

1 A. **He bought a condo for me to live in.**
 2 Q. Is that condo also located in the southeastern
 3 part of the state?
 4 A. **Yes.**
 5 Q. Do you remember about how much that condo cost?
 6 A. **95,000.**
 7 Q. 95,000, okay. Did you pay your father back at
 8 all?
 9 A. **No, he's renting it out. He gave me the year**
 10 **free to get off parole, save money, build my credit.**
 11 Q. That makes sense. So you stayed there for a
 12 year?
 13 A. **Uh-huh, yes.**
 14 Q. 2015 to 2016 you lived in your father's condo?
 15 A. **Yes.**
 16 Q. And then in 2016 where did you go?
 17 A. **I bought a house.**
 18 Q. Is the house also located in the southeast part
 19 of the state?
 20 A. **Yes.**
 21 Q. Did you finance the purchase of that home?
 22 A. **Yes.**
 23 Q. And how much did the house cost?
 24 A. **179,000.**
 25 Q. So you bought a home in 2016 for 179,000 in

1 southeast Michigan?
 2 A. **Yes.**
 3 Q. Okay. How long did you live in that house?
 4 A. **Three and a half years.**
 5 Q. So we'll go to 2019.
 6 A. **Yes, on the dot.**
 7 Q. All right. And where did you go in 2019?
 8 A. **I couldn't find another house to buy because the**
 9 **inventory was limited and renting was difficult so I had**
 10 **to ask my dad for another favor. He has clients that**
 11 **own condos and apartment buildings, they let me rent**
 12 **without a contract, without any restrictions.**
 13 Q. So you rented from your father again?
 14 A. **Yeah.**
 15 Q. How much did you sell your prior home for?
 16 A. **240,000.**
 17 Q. So then you then rented from your father from
 18 2019 until when?
 19 A. **July of last year, that's when I bought this**
 20 **place.**
 21 Q. And how much is your current -- how much did you
 22 buy your current house for?
 23 A. **92,000.**
 24 Q. And is it -- of course it's located in the
 25 southeast part of the state, correct?

1 A. **Yes.**
 2 Q. So did you have trouble finding suitable housing
 3 because of your CSC history since your release?
 4 A. **That's an interesting question. It's a two part**
 5 **question, it's not a simple yes and it's not a simple**
 6 **no. Let me see if I can put it in context. It was**
 7 **challenging to find a place to live regarding, you know,**
 8 **the registry and my past so people don't exactly approve**
 9 **my applications. So building my credit, asking my dad**
 10 **for help is the way I've been able to find housing, so,**
 11 **yes, I guess that's suitable housing.**
 12 Q. Are you married?
 13 A. **No.**
 14 Q. Do you have any children?
 15 A. **No.**
 16 Q. Do you have any siblings?
 17 A. **Yes.**
 18 Q. How many?
 19 A. **Three.**
 20 Q. Brothers and sisters? What's the makeup of the
 21 three?
 22 A. **My sister [REDACTED] is the oldest, and then I have**
 23 **two half siblings.**
 24 Q. Okay. And do your siblings have any children?
 25 A. **My sister does.**

1 Q. How many children does she have?
 2 A. **Two.**
 3 Q. Are they minors?
 4 A. **Yes -- well, no, he just had an 18th birthday**
 5 **so....**
 6 Q. Are you involved in your niece and nephew's life
 7 a lot?
 8 A. **No.**
 9 Q. No. Are you close with your siblings?
 10 A. **Yes.**
 11 Q. Did you graduate high school?
 12 A. **No, I got a GED while I was incarcerated.**
 13 Q. After you were released did you seek further
 14 education?
 15 A. **I thought about it but I needed to work, I needed**
 16 **to make money. I had restitution, paying off my fines**
 17 **and fees.**
 18 Q. And so since 2014 you haven't applied to any
 19 higher -- any kind of colleges or any universities or
 20 anything, any trade schools or anything like that?
 21 A. **No.**
 22 Q. And so the highest level of education you have is
 23 a GED?
 24 A. **Yes, sir.**
 25 Q. Were you employed before you were convicted?

1 **A. I was. I think I lost my job a couple weeks**
 2 **after they found out.**
 3 **Q. How did they find out?**
 4 **A. I don't remember.**
 5 **Q. And how long were you at that job before you were**
 6 **let go?**
 7 **A. I just got the job, I think I was there maybe six**
 8 **months.**
 9 **Q. Did you work before that job?**
 10 **A. Yes.**
 11 **Q. And what did you do before that job?**
 12 **A. [REDACTED].**
 13 **Q. Was that your first job?**
 14 **A. No, I've had many jobs. My first job was I was**
 15 **14, I worked at [REDACTED].**
 16 **Q. Okay, but would you consider like [REDACTED]**
 17 **[REDACTED] your first like out on your own type job?**
 18 **A. Yes, yes.**
 19 **Q. Okay, makes sense. So after [REDACTED]**
 20 **you went to the place that fired you. What did you do**
 21 **for [REDACTED]?**
 22 **A. I was a line cook.**
 23 **Q. And then the job that fired you after you'd**
 24 **gotten arrested, what did you do for them?**
 25 **A. I was a line cook as well.**

1 **Q. And how much were you -- roughly approximation**
 2 **what was your wages?**
 3 **A. Back then?**
 4 **Q. Yeah.**
 5 **A. Oh, I think 11, 12 bucks an hour. 12.**
 6 **Q. All right. So then you did your time and you**
 7 **were released. Were you employed when you got out?**
 8 **A. Yes.**
 9 **Q. Okay, so that was in 2014 you were released so**
 10 **you were employed -- was there a gap at all between the**
 11 **time you were released and employment?**
 12 **A. Nope.**
 13 **Q. No, so you went straight to work?**
 14 **A. Yup.**
 15 **Q. What did you do?**
 16 **A. Line cook, and then I was promoted a year and a**
 17 **half later.**
 18 **Q. So 2014 you were hired by was it just a**
 19 **restaurant?**
 20 **A. Yup, yes.**
 21 **Q. All right. Did you apply to the restaurant?**
 22 **A. Yes, I did.**
 23 **Q. And did the restaurant -- during the application**
 24 **process did they ask about your history of felonies?**
 25 **A. No, there was no question on there.**

1 **Q. There was no background check of any sort?**
 2 **A. Nope.**
 3 **Q. Did you let them know about your previous felony?**
 4 **A. I had to, I was on parole, I needed their letter**
 5 **to give to my parole agent to verify I had employment.**
 6 **Q. Did the nature of your parole require you to tell**
 7 **the prospective employer the nature of your offense?**
 8 **A. Yes.**
 9 **Q. So then in 2014 upon release you went to work for**
 10 **a restaurant. How long did you stay at that job?**
 11 **A. Three years.**
 12 **Q. So 2014 to 2017 you stayed at the restaurant.**
 13 **How much were you making approximately when you first**
 14 **started?**
 15 **A. I'm going to say 45,000 a year.**
 16 **Q. Okay. And then 2017 when you finished your**
 17 **employment there how much were you making?**
 18 **A. 49,000.**
 19 **Q. And then so, as you said, your employment with**
 20 **them ended in 2017. Why did it end?**
 21 **A. Harassment. A couple of managers found out I was**
 22 **on the registry, they started talking to others in the**
 23 **restaurant, making comments, if he hurts you we'll shoot**
 24 **him, I have a gun in the car kind of thing. And that**
 25 **just kind of -- it got worse so I left. I went to the**

1 **police station to report it, nothing came of that.**
 2 **Q. And so just to be clear, you quit because of the**
 3 **harassment of you being on the registry?**
 4 **A. Yes.**
 5 **Q. They didn't fire you because you were on the**
 6 **registry?**
 7 **A. Nope, I ended up quitting because the harassment**
 8 **became overwhelming.**
 9 **Q. Did you file any type of grievances with any type**
 10 **of employment agencies?**
 11 **A. No, I didn't know such a thing existed.**
 12 **Q. Did you speak to any kind of legal counsel as far**
 13 **as your treatment at the workplace?**
 14 **A. I talked to my father.**
 15 **MS. TILLMAN: Objection, privileged. I'm**
 16 **going to direct him not to answer.**
 17 **BY MR. DAMICH:**
 18 **Q. Did you seek legal counsel to try to resolve your**
 19 **situation?**
 20 **A. No.**
 21 **Q. That was a no?**
 22 **A. That was a no, yes.**
 23 **Q. Okay. So then did you -- were you unemployed**
 24 **after you quit?**
 25 **A. No, I walked right into another job.**

1 Q. Okay. So in 2017 you started another job?
 2 A. **(Nodding head up and down.)**
 3 Q. What type of work?
 4 A. **The same thing, line cook.**
 5 Q. All right, line cook at a restaurant?
 6 A. **Yes.**
 7 Q. Was it a pay increase?
 8 A. **Yes.**
 9 Q. How much?
 10 A. **\$2.00.**
 11 Q. Okay. Did you have to apply for that position?
 12 A. **No.**
 13 Q. Then how were you hired into that position?
 14 A. **I met the owner at the restaurant that I was**
 15 **managing at the previous job.**
 16 Q. So you actually achieved management status at
 17 your previous position, right?
 18 A. **Yes, while I was on parole.**
 19 Q. So you -- we'll get back to parole later. Okay,
 20 so for 2017 how long did you work at this next
 21 restaurant that you got the \$2 an hour raise?
 22 A. **For I want to say six months.**
 23 Q. And why did you leave?
 24 A. **The commute and the cost was too much. I needed**
 25 **a job closer to home.**

1 Q. Makes sense. Did you find a job closer to home?
 2 A. **I did, five minutes.**
 3 Q. Five minutes?
 4 A. **Five minutes, a walk.**
 5 Q. We'll still put that down at 2017. Was it
 6 another restaurant?
 7 A. **Yes.**
 8 Q. All right. And how long did you stay in that
 9 position?
 10 A. **Three years.**
 11 Q. Three years?
 12 A. **Four years.**
 13 Q. Four years, until 2021?
 14 A. **Yes.**
 15 Q. All right. Did you get a pay increase when you
 16 went to that job?
 17 A. **No.**
 18 Q. But you did save money because of travel and
 19 everything though, correct?
 20 A. **Yes.**
 21 Q. Was your salary decreased at all?
 22 A. **No. Actually, yes, I'm sorry, yes, it did**
 23 **decrease a little bit.**
 24 Q. So you figured that the economics of it all, you
 25 actually probably got a pay raise because you were

1 paying so much in gas and everything, correct?
 2 A. **Yes, yes.**
 3 Q. Okay. Did you become a manager at that
 4 restaurant?
 5 A. **No.**
 6 Q. So you stayed a line cook for four years?
 7 A. **Uh-huh, yes.**
 8 Q. And then why did you leave employment with that
 9 restaurant?
 10 A. **A friend of mine opened a restaurant, he was the**
 11 **executive chef and he knows my work ethic so he invited**
 12 **me to come work for him, and that was a very significant**
 13 **bump in pay, no application.**
 14 Q. No application or anything?
 15 A. **No.**
 16 Q. And how long did you stay at that position?
 17 A. **Two years.**
 18 Q. So until 2023?
 19 A. **Yes.**
 20 Q. You said a substantial bump in pay?
 21 A. **Yes.**
 22 Q. If you could give me an approximation?
 23 A. **\$23 an hour.**
 24 Q. As opposed to?
 25 A. **16.**

1 Q. And in 2023 you said -- did you get a new
 2 position then?
 3 A. **I did.**
 4 Q. And why did you leave your previous job, was it a
 5 better opportunity?
 6 A. **No, it was the harassment started, they found out**
 7 **I was on the registry. The manager got involved in the**
 8 **harassment, they ended up firing her because a few**
 9 **employees were -- they left, and then I left shortly**
 10 **after that.**
 11 Q. Okay. And so you weren't fired from that
 12 position?
 13 A. **No.**
 14 Q. And did you report your harassment to any kind of
 15 watch dog agency or any agency that --
 16 A. **I actually did.**
 17 Q. Okay.
 18 A. **I did not follow through with it. I got the**
 19 **original report that I sent, but I didn't follow through**
 20 **with it.**
 21 Q. Why not?
 22 A. **I don't want to relive this nightmare over and**
 23 **over again so.... the stress gets overwhelming.**
 24 Q. Sure. Okay, so how long did you stay in that
 25 position for?

1 **A. Two years.**
 2 **Q.** So is it your current position right now?
 3 **A. My current position is another restaurant.**
 4 **Q.** Okay.
 5 **A. I worked at [REDACTED] Grill and Feast, I'm sorry, I**
 6 **worked at two restaurant, they overlapped a little bit**
 7 **for eight months, just until I new I was secure in this**
 8 **job before I left the other one.**
 9 **Q.** Okay. And so your current job you've had for
 10 approximately how long?
 11 **A. I just got it, maybe two weeks.**
 12 **Q.** Oh, wow, congratulations.
 13 **A. Thank you.**
 14 **Q.** And what's your responsibilities at your new job?
 15 **A. I'm a chef. I'm just running the line, making**
 16 **sure that it runs smoothly, ensuring accuracy of**
 17 **recipes.**
 18 **Q.** Are you in a management position?
 19 **A. I am but I'm not, I'm still training.**
 20 **Q.** You're still training?
 21 **A. I'm training as a line cook. I haven't made it**
 22 **that far yet -- I'm sorry, I'm training as a chef,**
 23 **that's my title.**
 24 **Q.** But there is prospects to -- there seems to be
 25 future prospects with this position?

1 **Q.** Okay. And would you say -- are you involved in
 2 any extracurricular activities or anything?
 3 **A. No.**
 4 **Q.** I want to go back to the terms of your parole.
 5 So you were released in 2014, correct?
 6 **A. Correct.**
 7 **Q.** And how long were you on parole for?
 8 **A. Two years.**
 9 **Q.** Now previously you had testified that as part of
 10 the terms of your parole that you were required to tell
 11 prospective employers not only if you work -- not only
 12 about your previous felony but also the nature of the
 13 offense itself, correct?
 14 **A. Correct.**
 15 **Q.** Okay. What other type of things were required of
 16 you during parole?
 17 **A. Reporting, internet identifiers, identify home**
 18 **address, my vehicle, work. I don't attend a higher**
 19 **education but....**
 20 **Q.** Sure. Would you have to take drug tests?
 21 **A. Yes.**
 22 **Q.** How often?
 23 **A. Every -- I want to say every month or every**
 24 **couple weeks, I don't remember exactly.**
 25 **Q.** Were you allowed to drink alcohol?

1 **A. Yes.**
 2 **Q.** That if it goes well there will be advancements,
 3 right?
 4 **A. Oh, yes.**
 5 **Q.** Would you say it's a pay increase for this new
 6 position?
 7 **A. Yes.**
 8 **Q.** Okay. So since your release in 2014 you were
 9 able to go from job to job and be able to receive an
 10 increase in pay each time; is that accurate?
 11 **A. Correct.**
 12 **Q.** And you've been steadily employed since your
 13 release from prison, correct?
 14 **A. Yes.**
 15 **Q.** And you've been able to support yourself since
 16 your release from prison?
 17 **A. Yes.**
 18 **Q.** So is it fair to say that despite being on the
 19 registry you've been able to maintain employment and
 20 progress in your career?
 21 **A. I want to say -- can you repeat the question?**
 22 **Q.** Yes. So is it fair to say that despite being on
 23 the registry you've been able to maintain employment and
 24 progress in your career?
 25 **A. Yes.**

1 **A. No.**
 2 **Q.** Were there any restrictions on you leaving your
 3 city, county, state, anything along those lines?
 4 **A. Oh, yes, yes.**
 5 **Q.** What were those restrictions?
 6 **A. I wasn't allowed to leave the county. I**
 7 **couldn't -- the 1,000 foot exclusion rule applied then**
 8 **so I couldn't even drive past a school.**
 9 **Q.** And, again, this is terms of your parole, right?
 10 **A. Yes.**
 11 **Q.** Did you have to attend -- did the terms of your
 12 parole require you to attend any type of counseling?
 13 **A. Yes.**
 14 **Q.** What was the nature of that counseling?
 15 **A. It was a sex offender class.**
 16 **Q.** Were there any other type of counseling
 17 requirements?
 18 **A. No.**
 19 **Q.** Were there any other educational requirements
 20 during your parole?
 21 **A. No.**
 22 **Q.** Did your parole agent have the right to enter
 23 your home whenever he or she wanted to?
 24 **A. Yes.**
 25 **Q.** And search throughout your home for whatever he

1 or she wanted to?

2 **A. Yes.**

3 **Q.** Would you have to tell your parole agent before

4 or after you bought a car?

5 **A. I don't remember.**

6 **Q.** Would you have to tell your parole agent before

7 or after you moved?

8 **A. I had to tell her before I moved because she had**

9 **to go approve it.**

10 **Q.** Got you.

11 **A. She had to look at it and make sure it was....**

12 **Q.** Did you have to wear any kind of tracking device?

13 **A. Yes, GPS tether.**

14 **Q.** I'm going to go back to your conviction. And,

15 again, you were convicted in 2005, correct?

16 **A. Correct.**

17 **Q.** And you were convicted of two separate things,

18 correct?

19 **A. Correct.**

20 **Q.** One was criminal sexual conduct in the second

21 degree, the person was under 13?

22 **A. Yes.**

23 **Q.** And the other was gross indecency between a male

24 and a female?

25 **A. Yes.**

1 **Q.** Correct?

2 **A. Correct.**

3 **Q.** Let's start with the first, the criminal sexual

4 conduct in the second degree with a person under 13,

5 what happened?

6 **A. I had a roommate whose daughter lived with me, I**

7 **ended up abusing her.**

8 **Q.** Okay. Sexually?

9 **A. Yes.**

10 **Q.** Multiple occasions?

11 **A. Yes.**

12 **Q.** And how did you get caught?

13 **A. She told her mother.**

14 **Q.** Now, the gross indecency between male and female,

15 does that arise out of the same factual circumstances as

16 this --

17 **A. No, because when they offered the plea they said**

18 **they would offer me a second degree and then they wanted**

19 **to add an added count, a fourth, so I don't really**

20 **understand how that all came out.**

21 **Q.** All right, so the gross indecency was part of

22 your plea deal?

23 **A. Yes.**

24 **Q.** Okay. Did you sexually penetrate the child?

25 **A. No. No, I did not.**

1 **Q.** Did you touch?

2 **A. Yes.**

3 **Q.** Did you videotape?

4 **A. No.**

5 **Q.** Aside from your 2005 convictions have you been

6 convicted -- have you been charged with any other

7 crimes?

8 **A. No, sir.**

9 **Q.** No, okay. If you don't mind if we could take

10 like a five minute break?

11 **A. Yeah.**

12 **Q.** I appreciate that, thank you. How about we'll

13 do -- you know what, let's do 9:50 if you don't mind, is

14 that okay?

15 **A. Sounds good.**

16 **Q.** Thank you, I appreciate it.

17 **A. Not a problem.**

18 **(A recess was taken.)**

19 **MR. DAMICH:** All right, back on the record.

20 **BY MR. DAMICH:**

21 **Q.** So because of your convictions how often do you

22 have to register on the sex offender registry?

23 **A. Every three months.**

24 **Q.** So it's four times a year, correct?

25 **A. Yes, sir.**

1 **Q.** Okay. And then what type of information do you

2 need to verify with law enforcement when you go four

3 times a year?

4 **A. Everything, car, home, work.**

5 **Q.** Do you actually physically go to update your

6 information or verify?

7 **A. Yes.**

8 **Q.** And where do you go to do that?

9 **A. State police post. [REDACTED] I can't get through**

10 **the door.**

11 **Q.** You can't get through the door, explain that to

12 me?

13 **A. You have to ring a bell and they ask you what**

14 **you're there for, I need to register. I always get some**

15 **kind of an excuse, like this week they are out of town**

16 **for a week so nobody can register so I have to travel to**

17 **the state police post 22 miles. I've been to [REDACTED]**

18 **once, I've been through the door once in a year.**

19 **Q.** I got you. So [REDACTED] is the local police

20 station?

21 **A. Yes.**

22 **Q.** And not the Michigan State Police, is that

23 correct?

24 **A. Yes.**

25 **Q.** And so you've had to travel to the Michigan State

1 Police barracks to register?

2 **A. Yes.**

3 **Q.** And how far away is the Michigan State Police
4 barracks?

5 **A. 22 miles.**

6 **Q.** And how far away is your local police station?

7 **A. Right around the corner, three blocks literally,**
8 **maybe less.**

9 **Q.** And do you try to go to the [REDACTED] station
10 each time you try to --

11 **A. Yes.**

12 **Q.** And every time you get the same thing?

13 **A. Yeah, there's an excuse, like she's out to lunch,**
14 **come back later, they are gone on vacation for the week**
15 **that does the registry. I mean it's any number of**
16 **things. Or can you come back a little later on, you**
17 **know, all the people are gone.**

18 **Q.** And this is every single time?

19 **A. Except for one time I got through the door.**

20 **Q.** Okay. How many times have you had to register
21 since 2014?

22 **A. How many times have I registered total?**

23 **Q.** Yeah, or actually went and verified.

24 **A. Every three months. I can count them if you want**
25 **me to.**

1 **Q.** Well, it's going to be since 2014, we can do the
2 math, right?

3 **A. Four times, what, eight.**

4 **Q.** Yeah, so when you go to the Michigan State Police
5 barracks to register how long does it usually take you?

6 **A. They are usually pretty quick, maybe ten minutes.**

7 **Q.** Okay. So it's a 22 mile drive. How long does it
8 take to go 22 miles? I mean it could be -- I don't know
9 your dynamic there, but your 22 miles could be a lot
10 different than mine as far as travel time goes. Is it
11 22 minutes or is it --

12 **A. It varies, it could go from 20 to 40 minutes**
13 **depending on traffic. It's a highway.**

14 **Q.** Okay, got it. So is it fair to say you have to
15 dedicate an hour four times a year for your
16 registration?

17 **A. More than that.**

18 **Q.** Okay. So if you go to the MSP station, though,
19 if it's like an approximately ten minute visit once you
20 get there, you said 20 to 40 minute drive, even if it
21 was 40 minutes we're still under an hour there.

22 **A. For that one, yes. I mean the previous ones, I**
23 **mean I've sat and waited in police stations for an hour,**
24 **hour and a half before.**

25 **Q.** Okay. And so what other police stations have you

1 gone to?

2 **A. [REDACTED] Township, [REDACTED] County.**

3 **Q.** And was that out of convenience or is that just
4 because --

5 **A. That's where I was living in the area, southeast**
6 **Michigan.**

7 **Q.** So since March 2021 how many times have you had
8 to make changes to your information?

9 **A. Multiple times. I get a new car every couple**
10 **years, I've had to change my address multiple times.**
11 **Work, employment, every time I leave a job I have to go**
12 **to the police station and notify them.**

13 **Q.** Okay. And you've done -- you said you've done
14 that in person?

15 **A. Yes.**

16 **Q.** Are you aware that some of the information now
17 can be updated by mail?

18 **A. Yeah, I don't -- I'm not really comfortable with**
19 **that. I don't really trust that.**

20 **Q.** And why not?

21 **A. Things get lost in the mail, I've had bad**
22 **experiences with officers, so I just -- it's just better**
23 **to go in person.**

24 **Q.** Do you use the U.S. Postal Service at all for
25 anything?

1 **A. Nope.**

2 **Q.** No. Do you use any kind of mailing, FedEx,
3 anything?

4 **A. I've -- I don't use any FedEx, no. If I order**
5 **something it comes FedEx.**

6 **Q.** So you don't send anything out in the mail, you
7 don't send Christmas cards, you don't send thank you
8 letters, anything like that?

9 **A. Nope, I usually do it in person.**

10 **Q.** Any of your bills do you pay via mail?

11 **A. No, they are all automatic out of my bank**
12 **account.**

13 **Q.** All right. I'm going to go ahead and share my
14 screen with you real quick, sir, give me a second here.
15 Let me know when you see that.

16 **A. All right, I see it.**

17 **Q.** Have you seen this before?

18 **A. I have.**

19 **Q.** I'm going to scroll all the way down. And this
20 is a two page form.

21 **A. Uh-huh.**

22 **Q.** Have you seen the second page before?

23 **A. Yes.**

24 **Q.** Okay, actually three pages.

25 **A. Yes.**

1 Q. And what is this form?

2 A. **It's a registry, a mail-in update.**

3 MR. DAMICH: I'd like to offer this as
4 Deposition Exhibit A. Dayja, I don't know if you have
5 any objection?

6 MS. TILLMAN: No objection.

7 (Whereupon Deposition Exhibit A

8 marked for identification.)

9 BY MR. DAMICH:

10 Q. Have you utilized this form before?

11 A. **No.**

12 Q. But you do recognize what some of the information
13 is called for on this form, correct?

14 A. **Yes.**

15 Q. So like if we go up to this Roman numeral I where
16 it says offender information.

17 A. **Yes.**

18 Q. And anything underneath that, is there anything
19 confusing to you underneath there?

20 A. **No.**

21 Q. And if we go under number II here where it says
22 temporary residence information, anything confusing
23 there?

24 A. **No.**

25 Q. Number III it says contact information, do you

1 see any anything confusing to you there?

2 A. **Yeah.**

3 Q. Okay, what's confusing to you?

4 A. **When I was originally convicted none of that**
5 **applied so that is kind of confusing that I'm being**
6 **subject to it and I don't understand why.**

7 Q. Okay. If we could just focus on like the
8 information that it's calling for, not why you have to
9 respond to it.

10 A. **Okay.**

11 Q. Is there anything confusing about the information
12 it's asking you for?

13 A. **No.**

14 Q. And that's for all the information in Roman
15 numeral III, correct?

16 A. **Correct.**

17 Q. And then the same question for Roman numeral
18 number IV, vehicles.

19 A. **I understand that.**

20 Q. Okay. And V, mobile homes?

21 A. **I understand.**

22 Q. So you do understand what information is required
23 of you to report?

24 A. **Yes.**

25 Q. Okay. I'm going to go ahead and share my screen

1 again and let me know when you see this.

2 A. **I see it.**

3 Q. What this is here is a table of a series of
4 judicial decisions. And what we put in the larger box
5 here you'll see is a recitation of some of the statement
6 of facts from the case.

7 A. **Okay.**

8 Q. And you'll see it's a 47 page document. I'm
9 going to ask you a few questions surrounding these
10 factual scenarios, ask you to read them and then get
11 your take on them.

12 (Whereupon Deposition Exhibit B
13 marked for identification.)

14 MR. DAMICH: So I was going to go ahead and
15 without objection if I could offer this as Deposition
16 Exhibit B.

17 MS. TILLMAN: We do have a global objection
18 against this exhibit, as you know, so just to put that
19 same objection on the record, notwithstanding the
20 court's order allowing the use of this exhibit, we just
21 want to put that global objection to this exhibit and
22 the line of questioning associated with this exhibit as
23 both irrelevant and improper, but obviously you will go
24 ahead.

25 MR. DAMICH: Thank you, Dayja.

1 BY MR. DAMICH:

2 Q. Before I start asking you any questions, sir, do
3 you think the sex offender registry protects the public
4 in any way?

5 A. **No.**

6 Q. And why do you feel that way?

7 A. **It breeds mistrust, deceit, and hate, causes**
8 **violence. I haven't seen any good come out of it.**

9 Q. So you said mistrust, deceit, and hate, correct?

10 A. **Yes.**

11 Q. Let's go with mistrust; how does it breed
12 mistrust?

13 A. **I think that as people know about it they are**
14 **just mistrusting of their neighbors, they are always**
15 **worried that somebody is going to hurt them or do**
16 **something to their children. I don't think it serves**
17 **any purpose to scare people 'cause when they find out**
18 **that I'm on the registry I'm automatically a murderer**
19 **rapist, that's the extreme that everybody looks at, and**
20 **that's not the case.**

21 Q. And then you also mentioned that it breeds
22 deceit. Kind of elaborate on that a little bit too.

23 A. **Deceit as in --**

24 MS. TILLMAN: Objection, I'm just going to
25 put a brief objection on the record that lacks

1 foundation but you can answer. You can continue.
 2 THE WITNESS: Okay, can you repeat the
 3 question, I'm sorry?
 4 BY MR. DAMICH:
 5 Q. Yeah. You previously testified that the sex
 6 offender registry breeds, amongst other things, deceit.
 7 A. Yes.
 8 Q. Could you elaborate on what you meant by that?
 9 A. **When somebody wants to target you it can be**
 10 **deceitful. They don't want to tell you what's going on,**
 11 **they don't ask you, it becomes a secret whatever they**
 12 **are planning so it's deceiving, it's deceitful, I guess.**
 13 **Maybe that's the wrong word.**
 14 Q. Would you say that there's a plan by the
 15 legislatures against sex offenders here or --
 16 MS. TILLMAN: Objection, calls for
 17 speculation.
 18 THE WITNESS: Honestly I don't know.
 19 BY MR. DAMICH:
 20 Q. I think you said it breeds hate as well, can you
 21 tell me what you mean by that?
 22 MS. TILLMAN: Same objection, lacks
 23 foundation, but you can answer.
 24 THE WITNESS: People are hateful when they
 25 find out, they are cruel, very cruel.

1 BY MR. DAMICH:
 2 Q. Okay. When people find out about what?
 3 A. **When you're on the registry and they start**
 4 **digging. Right now I'm dealing with somebody that's**
 5 **pretty much stalking me.**
 6 Q. Have you contacted the authorities?
 7 A. **I haven't made direct contact with this person,**
 8 **I've just seen the car driving around every now and**
 9 **again, but if it becomes more than that then I am going**
 10 **to the police.**
 11 Q. Do you think they are stalking you because you're
 12 on the sex offender registry?
 13 A. **That's exactly what they are doing.**
 14 Q. And what purpose would they have to stalk you
 15 because you're on the sex offender registry?
 16 A. **I am dating their daughter.**
 17 Q. How old is their daughter?
 18 A. **30.**
 19 Q. And you are?
 20 A. **46.**
 21 Q. Have you brought it up to your girlfriend that
 22 you believe her parents are following you?
 23 A. **She's the one that told me.**
 24 Q. Okay.
 25 A. **She said that he got a complete dossier on me,**

1 **went to the courts and pulled everything, my federal**
 2 **habeas corpus.**
 3 Q. Do you think the sex offender registry may
 4 encourage victims to come forward?
 5 MS. TILLMAN: Objection, lacks foundation,
 6 calls for speculation.
 7 THE WITNESS: I honestly don't know.
 8 BY MR. DAMICH:
 9 Q. Do you think if the victims come forward to
 10 report sex crimes that that protects the public?
 11 A. Yes.
 12 Q. So if we go back to this list here could you read
 13 number three and let me know when you're done?
 14 A. Yes. **Okay, I've completed it.**
 15 Q. Okay. Would you want to know if this perpetrator
 16 lived next door to your sister?
 17 A. No.
 18 Q. Why not?
 19 A. **Because I'm going to be so focused and worried**
 20 **about what's going on next door that I'm going to be**
 21 **blind to anything else.**
 22 Q. So then you wouldn't want to know because it
 23 would create too much anxiety?
 24 A. **Yeah, absolutely. That's where I believe the**
 25 **mistrust comes in, it just breeds mistrust.**

1 Q. Do you think that the perpetrator there is a
 2 dangerous individual?
 3 A. **Doing that he was very dangerous. If he's a**
 4 **dangerous individual I can't say that now because I**
 5 **don't know the guy. I don't know who did that, people**
 6 **change. Then that was dangerous, yes, but I don't want**
 7 **to say he's dangerous currently.**
 8 Q. If you'd read number six for me, please.
 9 A. Yes. **Okay, I've completed it.**
 10 Q. Would you want to know this information if this
 11 perpetrator was going to babysit your niece?
 12 A. Yes.
 13 Q. You'd want to know that?
 14 A. Yes.
 15 Q. How about number 20, if you could read that.
 16 A. Okay.
 17 Q. Would you want to know if this perpetrator was
 18 your girlfriend's therapist?
 19 A. Yes.
 20 Q. Okay, read number 22.
 21 A. Yes.
 22 Q. Let me know when you're done.
 23 A. Okay.
 24 Q. Would you want to know if this individual lived
 25 next door to you?

1 **A. Yes.**
2 **Q.** If you would read number 26.
3 **A. Yes. Okay.**
4 **Q.** Would you want to know this information if this
5 perpetrator was going to babysit your niece?
6 **A. Yes.**
7 **Q.** All right. Have you ever contacted a member of
8 the Michigan legislature to inquire about changing the
9 sex offender registration law?
10 **A. I did.**
11 **Q.** How many times?
12 **A. Once, I sent a letter to the governor's office.**
13 **Q.** You sent a letter to the governor's office?
14 **A. Yes.**
15 **Q.** Okay. Do you understand the difference between
16 the executive branch and legislative branch of
17 government?
18 **A. I do.**
19 **Q.** And what's your understanding of that?
20 **A. The legislative branch makes the laws, the checks**
21 **and balances, and the executive is the president, and**
22 **the judicial is our courts.**
23 **Q.** Is it your understanding that -- do you
24 understand the executive does not write the law?
25 **A. Yes, the legislative does.**

1 **Q.** My question is why did you write Governor Whitmer
2 a letter and not your local legislator?
3 **A. I don't know. I think that was the first address**
4 **I came across.**
5 **Q.** I see. Do you think that Governor Whitmer has
6 the power to change the sex offender laws?
7 **MS. TILLMAN:** Objection, he's not an expert
8 and lacks personal knowledge to answer this question,
9 but you can continue.
10 **THE WITNESS:** She has the authority to not
11 sign it into law so she has the final say.
12 **BY MR. DAMICH:**
13 **Q.** Okay. So you're speaking of her vetoing a law,
14 is that your understanding of --
15 **A. (Nodding head up and down.)**
16 **Q.** If she had decided not to veto a law, do you know
17 whether Governor Whitmer has the power to change the sex
18 offender registration law?
19 **A. No, she --**
20 **MS. TILLMAN:** Objection, same objection.
21 You can go ahead.
22 **THE WITNESS:** Nope, she does not.
23 **BY MR. DAMICH:**
24 **Q.** And do you know whether she can reduce the
25 registration period?

1 **MS. TILLMAN:** Objection, same objection, go
2 for it.
3 **THE WITNESS:** I don't think she can.
4 **BY MR. DAMICH:**
5 **Q.** Do you know whether Colonel Gasper can change the
6 sex offender registration laws?
7 **MS. TILLMAN:** Same objection.
8 **THE WITNESS:** I am going to say I don't
9 know. He enforces them, he's supposed to uphold our
10 rights, so I mean, if the law is unjust, he should be
11 upholding just law.
12 **BY MR. DAMICH:**
13 **Q.** Okay. Do you know if Colonel Gasper has the
14 power to change the law if he believes it's unjust?
15 **MS. TILLMAN:** Same objection.
16 **THE WITNESS:** No, he doesn't have the
17 authority to change the law.
18 **BY MR. DAMICH:**
19 **Q.** And do you know whether he can reduce the
20 registration period?
21 **MS. TILLMAN:** Same objection.
22 **THE WITNESS:** No, I don't think he can.
23 **BY MR. DAMICH:**
24 **Q.** We touched upon this briefly earlier about the
25 idea of there being the opportunity of mail-in updates.

1 And if I remember your testimony previously you said
2 that you don't take advantage of that, correct?
3 **A. No.**
4 **Q.** And that is out of fear that your information
5 will be lost?
6 **A. Lost, misplaced, for any number of reasons. I've**
7 **had letters get lost in the mail in the past a while**
8 **back, I mean it happens, so I just feel it can be more**
9 **accurate when you're there in person so there's no**
10 **misunderstanding and no mistakes.**
11 **Q.** Got you. Taking out the -- putting aside for the
12 moment the potential for human error, would you agree
13 that mailing in updates is actually a lot easier than
14 actually going and physically appearing to make updates?
15 **A. Honestly I don't know, I haven't done it.**
16 **Q.** Just the physical activity, you know, you don't
17 have to get in your car and drive the 22 miles or
18 however long and wait?
19 **MS. TILLMAN:** Objection, asked and answered,
20 but you can answer.
21 **THE WITNESS:** Okay. Can you repeat the
22 question?
23 **BY MR. DAMICH:**
24 **Q.** Yeah, sure. I mean respectfully you did say that
25 you haven't taken advantage of the mail-in update yet so

1 you wouldn't know if it would be any less burdensome
 2 from a physical standpoint, but wouldn't you agree just
 3 from a general standpoint that if you don't have to
 4 drive 22 miles, if you don't have to wait for ten
 5 minutes at the MSP barracks, if you just mail something
 6 in it could be a lot easier from a physical standpoint?
 7 MS. TILLMAN: Same objection.
 8 THE WITNESS: I would think so, yes.
 9 MR. DAMICH: Okay. I don't have any further
 10 questions.
 11 MS. TILLMAN: Perfect. I do have a couple
 12 of follow-up questions but could you give me about five
 13 minutes to kind of get everything together?
 14 MR. DAMICH: Yeah, absolutely, take your
 15 time.
 16 MS. TILLMAN: All right. So I'll be back I
 17 guess at 10:25?
 18 MR. DAMICH: 10:25? All right.
 19 (A recess was taken.)
 20 EXAMINATION
 21 BY MS. TILLMAN:
 22 Q. Okay, perfect, everyone's back. And this
 23 probably will be a little bit jumpy, it won't be as
 24 succinct as Scott's questions just because I'm kind of
 25 like -- you know, I took notes and I'm following up on a

1 couple of things so just forgive me for that. But If
 2 everybody's ready I will jump in.
 3 MR. DAMICH: I appreciate the succinct
 4 comment there.
 5 MS. TILLMAN: No problem, good job.
 6 BY MS. TILLMAN:
 7 Q. All right, so you earlier testified, right, that
 8 you are about 23 miles away from the Michigan State
 9 Police that you had to recently regis- -- or recently go
 10 to to do your registration updates, correct?
 11 A. Yes.
 12 Q. And is that 23 miles one way or round trip?
 13 A. One way.
 14 Q. One way. So it's about 46 miles in total?
 15 A. Yes.
 16 Q. More or less?
 17 A. Yes.
 18 Q. And I remember you testified that that 23 miles
 19 takes about 20 to 40 minutes, depending on traffic?
 20 A. Yes.
 21 Q. So presuming for the round trip you can just
 22 double that 20 to 40 minutes, so about 40 to 80 minutes?
 23 A. Yes.
 24 Q. Got you. So generally it would take you about 40
 25 to 80 minutes in total?

1 A. Total.
 2 Q. Not including the ten minutes that you're in the
 3 building registering?
 4 A. Right.
 5 Q. Okay, got you, I just wanted to get a little
 6 clarification on that. And then you talked a little bit
 7 about your housing post prison. And so you earlier
 8 testified that you were paroled to your dad's house
 9 after, right?
 10 A. Yes.
 11 Q. And then at some point your dad bought you a
 12 condo because you didn't have the opportunity --
 13 A. Yes.
 14 Q. -- to buy one yourself? Can you actually talk a
 15 little bit more about why your dad had to buy you the
 16 condo and you couldn't like get one yourself?
 17 A. Got you. At the time my credit score was still
 18 building, it wasn't quite over 700 yet and I had the
 19 money set aside, but when I applied for the mortgage I
 20 didn't have any credit for ten years and my credit score
 21 was still kind of low so that made it really challenging
 22 so he had to get involved.
 23 Q. Got you. And then I believe you said before your
 24 current residency you also lived in a condo that you
 25 were able to rent from your dad, right?

1 A. Yeah, yes.
 2 Q. Okay. So is it fair to say that a lot of your
 3 stable housing came through the support of your father?
 4 A. Oh, absolutely, 100 percent.
 5 Q. Got you. And so then I'm going to just
 6 transition a little bit to your employment.
 7 A. Yes.
 8 Q. Just a couple of follow up questions on that. So
 9 you earlier testified or you mentioned moreso that in
 10 the first job that you landed after being paroled you
 11 left that job because you started experiencing
 12 harassment from your co-workers?
 13 A. Yes.
 14 Q. Could you just expand a little bit more on that?
 15 A. Harassment as far as a couple of managers found
 16 out so they started doing a little bit of digging. They
 17 printed documents off of the internet and gave them to
 18 the owner and said that a customer came at three o'clock
 19 in the morning and brought this here, said you have a
 20 dangerous person working for you. It was a story, but
 21 the owner filled me in with everything that was going on
 22 but wouldn't do anything to stop it.
 23 People, you know, they avoid you, they avoid
 24 conversations. You hear snippets of things, threats. I
 25 received emails with pedophile on it with a target and

1 bullet holes through it. I mean, you know, so after a
2 while you just have enough.

3 So that's -- finding employment is easy,
4 keeping it is what I consider stable, and that is not
5 stable in the long run whenever they find out. And they
6 find out everywhere, it's just a matter of time. I try
7 not to give out my name or my phone number to keep it,
8 you know, somewhat under wraps, but, you know, it pops
9 up in my job and my car, so it's not that hard.

10 Q. And sticking with this first job, before that
11 happened, before the harassment and the exposure kind of
12 took place, had you planned to remain at that job
13 longer?

14 A. **Yeah, the owner wanted me to stay.**

15 Q. Got you. And so this also happened at another
16 job, at the job that you just had prior to your most
17 current job, correct?

18 A. **Yes, yes.**

19 Q. And can you just expand a little bit on what
20 happened in that situation?

21 A. **I was talking to a server there, she found out,
22 became uncomfortable. She reached out to another
23 server, a male that we know, and he asked me not to have
24 contact with her so I stopped contact. Three months
25 down the road she brings it out, she's telling people I**

1 **was harassing her. The manager got involved, other
2 employees got involved started voicing their concerns
3 and kind of made an ordeal out of it. And I was up for
4 a promotion to be the sous chef there so that was
5 directly affected.**

6 The manager was terminated because of it and
7 other employees, they left, and the ones that were still
8 there, they just kind of were okay with it.

9 Q. And so what was your experience like, just the
10 work culture, your relationship with your co-workers,
11 and things like that in the times that your registry
12 status did get exposed to your co-workers, what was your
13 relationship and the culture like before that happened?

14 A. **You're able to communicate and talk with people.
15 There's common interaction, you know, normal
16 conversation. Afterwards it just kind of people back
17 off, like immediately. They consider me immediately
18 dangerous, they don't know anything other than what they
19 see.**

20 Q. And just if I am summarizing your earlier
21 conversation with Scott, you had about five or six jobs
22 in the last eight years, correct?

23 A. **Yes.**

24 Q. And would you consider having to change jobs five
25 or six times in eight years to be stable employment?

1 A. **Not at all.**

2 Q. Got you. And then I want to ask you a couple of
3 questions about you earlier testified to being -- to
4 recognizing the explanation of duties mail-in form,
5 right, you've never used it but you recognize the form,
6 correct?

7 A. **Yes.**

8 Q. And so when you go in to update or verify the
9 four times a year you have to sign that form, correct?

10 A. **Yes.**

11 Q. And when you sign the form do you understand
12 everything that you've just read on the form before
13 signing it?

14 A. **Yes.**

15 Q. Got you. And have you ever not signed the form
16 before?

17 A. **No.**

18 Q. And so just generally speaking why do you sign
19 the form?

20 A. **If you don't it's a felony or I mean you can get
21 punished. I don't want to go back to prison at all.**

22 Q. Got you. And then I've just got a couple of more
23 follow up questions for you. I just want to ask you a
24 little bit more about your parole, I know you talked at
25 length about that. So just to rehash it, you were on

1 parole for about two years, correct?

2 A. **Correct.**

3 Q. And you successfully completed your parole?

4 A. **Correct.**

5 Q. And so when you were on parole were you also on
6 the registry?

7 A. **Yes.**

8 Q. And do you believe that there was any overlap or
9 similarities between your time on parole and your time
10 on the registry?

11 A. **I believe it's the same thing, they want to know
12 everything about you, where you're at, what you're
13 doing, where you're working, who you're talking to on
14 the internet. I mean the only difference is I don't
15 have that live person right here asking me those
16 questions.**

17 Q. And did you have similar concerns about being on
18 the registry or moreso did you have similar concerns
19 while you were on parole that you have about being on
20 the registry?

21 A. **I don't think I understand that totally.**

22 Q. For sure, let me see if I can rephrase. Were
23 there any concerns that you had about violating your
24 parole that you share in terms of like violating your
25 registry?

1 A. Yes.

2 Q. Does that make sense?

3 A. Yes, because if I violated parole you go to jail,
4 you violate, you know, the registry you go to jail, it's
5 the same extreme.

6 MS. TILLMAN: Got you. And I think that is
7 probably all of my questions that I have for you.

8 THE WITNESS: Okay.

9 MR. DAMICH: I just have a few follow ups
10 real quick.

11 RE-EXAMINATION

12 BY MR. DAMICH:

13 Q. Okay. Does SORA require you to contact the MSP
14 before you apply for a job?

15 A. No.

16 Q. But you had to when you were on parole, correct?

17 A. Yes.

18 Q. Does SORA require you to take drug tests?

19 A. No.

20 Q. Were you required to when you were on parole?

21 A. Yes.

22 Q. Okay. Does SORA require you to wear a tether?

23 A. No.

24 Q. Were you required to when you were on parole?

25 A. Yes.

1 Q. Okay. Does SORA allow a police officer to enter
2 your home at any time for any reason?

3 A. No.

4 Q. And was your parole officer allowed to?

5 A. Yes.

6 Q. Okay. Does SORA prevent you from driving past
7 schools?

8 A. No.

9 Q. Were you allowed to drive past schools when you
10 were on parole?

11 A. No, not on parole, no.

12 Q. Okay. Does SORA say you can't drink alcohol?

13 A. No, it does not.

14 Q. Were you allowed to drink alcohol when you were
15 on parole?

16 A. No.

17 Q. How about drugs, does SORA say you can't use
18 drugs?

19 A. No.

20 Q. And when you were on parole you were subjected to
21 drug tests, right?

22 A. Correct.

23 Q. And if you tested positive for a drug what would
24 happen?

25 A. Revocation of parole.

1 Q. So I guess I'm confused when you say that SORA is
2 the same as parole after everything we just went over,
3 from drug tested, to being tethered, to not being able
4 to drink, to even having to reach out to your parole
5 officer to ask to apply for a job when none of that is
6 required by SORA, I guess how is that similar?

7 MS. TILLMAN: Objection, argumentative, but
8 you can answer.

9 THE WITNESS: The only difference is you
10 don't report to the person live, that's the only
11 difference. Can you repeat the question?

12 BY MR. DAMICH:

13 Q. Sure. Previously when Dayja was asking you some
14 questions you had equated SORA to parole saying it's the
15 same thing. And we just went -- in the follow up
16 questions with me we went through probably about five or
17 six different items that you have to do on parole, when
18 you're on parole, that you did not have to do or you
19 don't have to do under SORA, including wearing a tether,
20 being subjected to drug testing, not being allowed to
21 drink. I guess how could you make the statement that
22 being on SORA is the same as being on parole?

23 A. The same punishment applies. You lose your
24 freedom.

25 Q. The same levels of freedom?

1 A. Honestly I don't know. Maybe I don't understand
2 the question, relevance.

3 Q. Sure, I guess it being simple -- do you drink
4 beer?

5 A. No.

6 Q. Okay. It would be as simple as if you went and
7 had a beer right now it wouldn't be a felony under SORA?

8 A. Right.

9 Q. But if you were on parole it would have been,
10 right?

11 A. Right.

12 Q. So that would be a major difference in your
13 freedom, correct?

14 A. Absolutely.

15 Q. Okay. And I'm presuming right now you're not
16 wearing a tether, right?

17 A. Correct.

18 Q. And you were when you were under parole, correct?

19 A. Correct.

20 Q. And when you were wearing that tether and if you
21 went outside of your boundaries what happened?

22 A. I violated parole, revocation.

23 Q. So I guess the circumstances it would lead to a
24 violation and the different scenarios makes it
25 different, correct?

1 **A. Yes, but you still lose your freedom in some**
 2 **shape or form.**

3 **Q.** Do you consider it a loss of freedom when there's
 4 a speed limit posted?

5 **A. No.**

6 **Q.** Do you consider it a loss of freedom whenever you
 7 can't drink under the age of 21?

8 **A. No.**

9 **Q.** But you still consider -- you still consider
 10 being on the sex offender registry as losing the same
 11 amount of freedoms as being on parole?

12 **A. Yes.**

13 **Q.** And you truly believe that?

14 **A. I truly believe that.**

15 MS. TILLMAN: Objection, asked and answered.

16 MR. DAMICH: Okay. I don't have any further
 17 questions.

18 MS. TILLMAN: No questions for me either.

19 (Whereupon Deposition concluded at 10:40 a.m.)
 20
 21
 22
 23
 24
 25

1 STATE OF MICHIGAN)
) SS

2 COUNTY OF INGHAM)

3 I, Melinda Nardone, Certified Shorthand
 4 Reporter and Notary Public in and for the County of
 5 Ingham, State of Michigan, do hereby certify that the
 6 foregoing deposition was taken before me at the time
 7 hereinbefore set forth.

8 I further certify that said witness was
 9 duly sworn in said cause to tell the truth; that the
 10 testimony then given was reported by me remotely to the
 11 best of my ability; subsequently produced under my
 12 direction and supervision; and that the foregoing is a
 13 complete, true, and correct transcript of my original
 14 shorthand notes.

15 IN WITNESS WHEREOF, I have hereunto set
 16 my hand and seal this 29th day of May, 2023.
 17
 18

19 _____
 20 Melinda S. Nardone, CSR-1311,
 21 Certified Shorthand Reporter,
 and Notary Public, County
 22 of Ingham, State of Michigan.
 23 My Commission Expires: 10-24-24
 24
 25

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